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May 30, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, MDL No. 3080
Case No. 2:23-md-03080-BRM-RLS

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending May 23 and May 30. We have also attached a current list of pending motions.

1. The parties submitted their joint letter brief regarding global deficiencies in SFP Plaintiff Fact Sheet responses and productions to the Court via email on May 23, 2025. Defendants have requested oral argument. ECF No. 543.
2. The parties submitted their reply letter briefs regarding the privilege log protocol on May 16, 2025. ECF Nos. 567, 570. Plaintiffs have requested oral argument (live or remote), and Defendants take no position. ECF. No. 586.
3. Plaintiffs filed discovery motions for resolution by Magistrate Judge Singh concerning Defendants Emisar and Ascent. ECF Nos. 576, 577. Defendants Emisar and Ascent filed their responses to those motions in accordance with CMO #17. ECF Nos. 590, 591.
4. The PBM Defendants' oppositions to Plaintiffs' Motion to Compel Responses to Compass Lexecon Subpoena to Produce Documents are being filed on May 30, 2025. *See* ECF No. 522. Plaintiffs' reply will be filed June 13, 2025.
5. Defendants provided Plaintiffs with edits to the deposition protocol on February 7, 2025. On April 4, 2025, Plaintiffs sent Defendants their collective edits to the draft deposition protocol. Defendants continue to review Plaintiffs' draft and are working on a collective set of edits.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ Joanne Cicala

Joanne Cicala

Liaison Counsel for

State Attorney General Track

/s/ David R. Buchanan

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Liaison Counsel for

Self-Funded Payer Track

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/s/ Matthew Gately

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Class Action Track

/s/ John D. Tortorella

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Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (*via* ECF)
Counsel of Record (*via* ECF)